BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMENTARY
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO INTERROGATORY OF UNITED PARCEL SERVICE (UPS/USPS-T29—18)

The United States Postal Service hereby provides the response of witness Daniel to the following interrogatory of United Parcel Service: UPS/USPS--T29—18, filed on August 28, 1997.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Anthony F. Alverno

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2997; Fax –5402 September 11, 1997

RESPONSE OF U.S. POSTAL SERVICE WITNESS DANIEL TO INTERROGATORY OF UNITED PARCEL SERVICE

UPS/USPS-T29-18. Please confirm that the source of the numbers in Exhibit USPS-29E, page 2 of 6, is the column labeled "4" Parc Zone R" at page IV-5 of LR-H-106. If confirmed, please explain why the source numbers are not the same as in Exhibit USPS-29E, page 2 of 6, and provide a corrected source if necessary. If not confirmed, please provide the exact page and column reference for the numbers in Exhibit USPS-29E, page 2 of 6.

RESPONSE:

Confirmed. A correction to page 2 of Exhibit USPS-29E will be filed.

DECLARATION

I, Sharon Daniel, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

SHÁRON DANIEL

Dated: September 11, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Anthony F. Alverno

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 September 11, 1997